

**UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
WILLIAM J. O'BRIEN AND CHRISTINE O'BRIEN :
: NO. 15-12654-ELF

MOTION TO OPEN AND ENTER DISCHARGE
IN CHAPTER 13 PROCEEDING UNDER TITLE 11 U.S.C.

Debtors, by their counsel, hereby Motions the Court for an Order to Open the Case and enter a Discharge in their CHAPTER 13 proceeding and in support of said Motion states the following:

1. Debtors filed a petition for relief under CHAPTER 13 on April 16, 2015.
2. Debtors were reminded that they must sign and complete the Domestic Support Certification in order to obtain a discharge pursuant to 11 U.S.C. Section 1328(g) on numerous occasions by counsel by mail and email enclosing and/or attaching the form for signatures.
3. An Order was issued by the Court setting a deadline to complete, sign and file the Domestic Support Certification or have the case closed without a discharge and counsel made debtors aware of the deadline.
4. The debtors did not comply and the Court closed the case without a Discharge.
5. Counsel for debtors continued to reach out to debtors and they finally responded with debtor Christine O'Brien indicating that debtor William O'Brien disregarded the emails and mail and that she, debtor Christine O'Brien, was unaware of the issue.
6. The Domestic Certifications have been completed and signed and are being filed this same day.
7. The debtors completed all other obligations required under their Chapter 13 Plan.

WHEREFORE, it is respectfully requested that the Court allow the case to be opened in

order to enter a final Discharge.

Dated: October 2, 2020

By: /s/ Michael P. Kelly
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ORDER OPENING CASE AND ENTERING DISCHARGE

AND NOW, this day of , 2020 upon consideration of the
Motion filed by Michael P. Kelly, Esquire,

ORDERED, that the case is Re-Opened, and a Discharge Order shall be granted.

BY THE COURT:

BY: _____
The Honorable ERIC L. FRANK
Bankruptcy Judge